

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE: Ashley Lomison	: CHAPTER 13
xxx-xx-2456	: CASE NO. 14-18589-JKF
574 Gravel Pike	:
Collegeville, PA 19426	: HEARING DATE: 2/25/3015
	: TIME: 9:30 A.M.
	: LOCATION: COURT ROOM No. 3
	: United States Bankruptcy Ct.
Debtor	: 900 Market St., 2 <sup>nd</sup> Floor
	: Philadelphia, PA 19107

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ANSWER OF DEBTOR TO MOTION OF  
LAKEVIEW LOAN SERVICING LLC FOR RELIEF  
FROM THE AUTOMATIC STAY UNDER 11 U.S.C. §362

AND NOW comes the Debtor, Ashley Lomison, through her counsel, and in response to the Motion of Lakeview Loan Servicing LLC for relief from the automatic stay does say and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.

5. Admitted in part. It is admitted that the automatic stay has acted as a bar to commencing or continuing any litigation against the Debtor. The remainder of the allegation is denied as a conclusion or conclusions of law, to which no further response is required.

6. Denied in part. While it is admitted that the Debtor has not made certain post-petition mortgage payments, it has been the intention and expectation of the Debtor to make payments, and

fund the Chapter 13 Plan, with insurance proceeds subsequent to the repair of the premises in question. However, the Movant has continued to block such payment, in clear bad faith.

7. Denied. No fees have been approved by the Court for the Counsel for the Movant. Since all fees payable by a bankruptcy estate must be approved by the Court, these fees must be disallowed.

8. Denied. The averments of paragraphs 7 and 8 are incorporated herein by reference, as if set forth at length.

9. Denied as a conclusion of law, to which no further response is required.

10. Denied as a conclusion of law, to which no further response is required.

WHEREFORE, Debtor prays the Motion for relief from the automatic stay be denied.

Dated: February 9, 2015

Respectfully submitted

/s/ Michael W. Gallagher  
Michael W. Gallagher, Esquire  
Plymouth Greene Office Campus  
1000 Germantown Pike, Ste A-1  
Plymouth Meeting, PA 19462  
(484)679-1488  
(610)365-7919 Fax  
Attorney for Debtors